


DEPOSITION SUBPOENA: DUCES TECUM F.R.C.P. Rule 30(a) and Rule 45UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTSCIVIL ACTION
NO. 2003-CV-12426 RCL

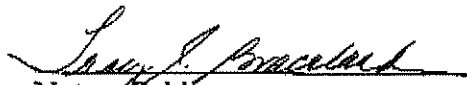
CAREFREE PARK CORPORATION,)
Plaintiff,)
)
v.)
)
ADIB NABHAN,)
Defendant.)
)

TO: Jamile Nabhan
c/o Gordon M. Jones, III, Esq.
Nixon Peabody LLP
100 Summer Street
Boston, MA 02110

GREETINGS: YOU ARE HEREBY COMMANDED in accordance with the provisions of Rule 45 of the Federal Rules of Civil Procedure, to produce and permit inspection and copying of the documents set forth on the attached Schedule A at 10:15 a.m., on May 10, 2004, at the offices of Doyle C. Valley, Morrison, Mahoney & Miller, LLP, 250 Summer Street, Boston, MA 02210.

YOUR APPEARANCE AT THE PLACE, DATE AND TIME SPECIFIED ABOVE WILL NOT BE REQUIRED IF PRIOR ARRANGEMENTS ARE MADE FOR THE PRODUCTION OF CERTIFIED COPIES OF THE REQUESTED DOCUMENTS. PLEASE CONTACT ATTORNEY DOYLE C. VALLEY AT (617) 439-7500.


Doyle C. Valley BBO#638578
MORRISON, MAHONEY & MILLER
250 Summer Street
Boston, MA 02210
(617) 439-7500


Notary Public
My Commission Expires: 5/26/10

SCHEDULE "A"

1. Federal and state income tax returns.
2. Money or other assets received from Carefree Park Corporation.
3. Money or other assets received from the Adele Realty Trust.
4. Valuations or appraisals of Carefree Park Corporation's property in any place other than Florida.
5. Copies of any trusts, amendments, revisions or revocations thereto for any trust in which you are a trustee or have a beneficial interest.
6. Copies of Articles of Organization, bylaws, minutes of corporate meetings for any corporation in which you are an director, officer or shareholder.
7. Money or other assets received from Amin Nabhan.
8. Money or other assets received from Adib Nabhan.
9. Money or other assets received from Fun Center, Fun Depot and/or Fun Depot, Inc.
10. Money or other assets received from Carousel Lounge and/or Carousel Lounge, Inc.
11. Communications with and documents sent to and received from Bigelow & Company.

Rule 45, Federal Rules of Civil Procedure, Parts C & D:

PROTECTION OF PERSONS SUBJECT TO SUBPOENAS.

(1) A party or an attorney responsible for the issuance and service of a subpoena shall take reasonable steps to avoid imposing undue burden or expense on a person subject to that subpoena. The court on behalf of which the subpoena was issued shall enforce this duty and impose upon the party or attorney in breach of this duty an appropriate sanction which may include, but is not limited to, lost earnings and reasonable attorney's fee.

(2) (A) A person commanded to produce and permit inspection and copying of designated books, papers, documents or tangible things, or inspection of premises need not appear in person at the place of production or inspection unless commanded to appear for deposition, hearing or trial.

(B) Subject to paragraph (d)(2) of this rule, a person commanded to produce and permit inspection and copying may, within 14 days after service of subpoena or before the time specified for compliance if such time is less than 14 days after service, serve upon the party or attorney designated in the subpoena written objection to inspection or copying of any or all of the designated materials or of the premises. If objection is made, the party serving subpoena shall not be entitled to inspect and copy materials or inspect the premises except pursuant to an order of the court by which the subpoena was issued. If objection has been made, the party serving the subpoena, may upon notice to the person commanded to produce, move at any time for an order to compel the production. Such an order to compel production shall protect any person who is not a party or an officer of a party from significant expense arising from the inspection and copying commanded.

(3) (A) On timely motion, the court by which a subpoena was issued shall quash or modify the subpoena if it

(i) fails to allow reasonable time for compliance;

(ii) requires a person who is not a party or an officer of a party to travel to a place more than 100 miles from the place where that person resides, is employed or regularly transacts business in person, except that, subject to the provisions of clause (c)(3)(B)(iii) of this rule, such a person may in order to attend trial be commanded to travel from any such place within the state in which the trial is held, or

(iii) requires disclosure of privileged or other protected matter and no exception or waiver applies, or

(iv) subjects a person to undue burden.

(B) If a subpoena

(i) requires disclosure of a trade secret or other confidential research, development, or commercial information, or

CAREFREE PARK CORP.

14 OCEAN FRONT SOUTH
P.O. BOX 5069
SALISBURY, MA 01952
(978) 465-0221

May 20, 2004

Gordon Jones
Nixon Peabody, LLP
100 Summer Street
Boston, Mass 02110

Dear Mr. Jones:

Adele Nabhan (Amin's adopted mother) Died in April of 1995, In the fall of that year I spent 2 weeks in Florida taking care of Adele's Affairs and helping Adib in the business giving him time off and doing minor chores. When I returned for the holiday vacation I worked along with him during the busy holiday season.

I worked in the business in Florida during the holiday season from the time he opened the business in 1989 until the time Habib Nabhan (biological father) died, November of 1998. On several occasions I went to Florida at the end of the summer season and took his place so he could take some time off with his wife.

Adib sent used equipment to Mass in 1998 and 2000.

- 2 Rush 2049
- 2 Cruisin USA
 - Blitz
 - Virtua Cop
- 2 Super GT
- 2 Tokyo War
 - Marvel Cap Com
 - Water Ski
 - House of the dead

If you have additional questions call me.

Sincerely,



Amin Nabhan